

# ReedSmith

Driving progress  
through partnership

**Rebecca R. Hanson**

Direct Phone: +1 312 207 2831  
Email: rhanson@reedsmith.com

**Samuel Kadosh**

Direct Phone: +1 212 549 0451  
Email: skadosh@reedsmith.com

Reed Smith LLP  
10 South Wacker Drive  
Chicago, IL 60606-7507  
+1 312 207 1000  
Fax +1 312 207 6400

Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650  
+1 212 521 5400  
Fax +1 212 521 5450  
reedsmith.com

November 29, 2022

12/9/2022

The requested sealing is granted. SO  
ORDERED.

VIA ECF

The Honorable Paul A. Crotty  
United States District Court  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312



**Re: *E.V. v. Oxford Health Plans (NY), Inc. ("Oxford")*, erroneously sued as United Healthcare Oxford, and United Behavioral Health ("UBH") (collectively, "United"), S.D.N.Y., No. 1:22-CV-02855-PAC**

Dear Judge Crotty:

We represent Defendants Oxford Health Plans (NY), Inc. ("Oxford"), erroneously sued as United Healthcare Oxford, and United Behavioral Health ("UBH") (collectively, "United") in the above-referenced matter. Pursuant to the Court's Individual Motion Practices and Rules, United writes to request **sealing of the Administrative Record filed in conjunction with its Motion for Summary Judgment**. The aforementioned Administrative Record is being filed contemporaneously with this letter.

The Administrative Record contains documents that United has determined to be designated as Confidential pursuant to the Stipulated Confidentiality Agreement and Protective Order ("Protective Order") in this matter. (Dkt. #45). Specifically, the Administrative Record contains Protected Health Information and Individually Identifiable Information, which are protected by HIPAA and are deemed Confidential under Section 2 of the Protective Order, as well as Defendants' confidential and proprietary business information.

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As such, United respectfully requests that the redactions in its Motion remain under seal. United thanks the Court for its consideration of this request.

Respectfully submitted,

/s/ Samuel Kadosh

Samuel Kadosh  
Rebecca R. Hanson

cc: Counsel of Record (*via CM/ECF*)